NOV 2 3 2004

## EXHIBIT 2

## 510(k) Summary

KaVo America Corporation 340 East Main Street Lake Zurich, Illinois 60047 Toll Free: 800 323 8029 Tel: 847 / 550 - 6800

Fax: 847 / 550 - 6825 e-mail: info@kavousa.com Contact: John Franz, President August 30, 2004

1. Identification of the Device:

Proprietary-Trade Name: KaVo RONDOflex® plus 360 Handpiece

Classification Name: Airbrush

Product Codes KOJ

Common/Usual Name: Airbrush

- 2. Equivalent legally marketed device: KaVo Corund Handpiece 2013 (K002708); Velopex Aquacut Fluid Abrasion Unit (K024105) and Sirona Dental Systems Prosmile Air Polisher and Prophylaxis Powder (K033675). The latter two units use water with the airbrush.
- 3. Indications for Use (intended use): The KaVo RONDOflex® plus 360 Handpiece is intended for the: preparation for fissure sealing by cleaning, opening, and extending the fissures; creation of micro-mechanical retention for adhesive restorations on enamel and dentine with subsequent acid etch technique; preparation-of small carious defects; removal of deep discolorations in the enamel; cleaning and removal of adhesive residues from bridges, crowns, etc.; and, preparation of adhesive surfaces of brackets.
- 4. Description of the Device: This submission is for a modification of a device system cleared under K002708, KaVo Corund Handpiece 2013. The modification is in the form of adding dental water to the stream.

The RONDOflex plus 360 is an air abrasion system in which alumina particles are accelerated to high speed in an air jet in order to remove material from the tooth surface.

Technical data: RONDOflex plus 360

Drive pressure: 3.2 - 6.0 bar

Water pressure:  $1.5 \pm 1.0$  bar Air consumption 5 - 11 l(S.T.P.)/min depending on cannula type The pressure set on the turbine drive is automatically increased by 20%, e.g. from 2.8 to 3.2 bar

Water flow rate: approx. 40 cm3/min

Have the pressures of your unit which have been set by the manufacturer checked regularly by a service engineer in order to ensure satisfactory operation of the instrument.

Connection: Can be mounted on all MULTIflex couplings.

5. Safety and Effectiveness, comparison to predicate device:

Comparison	KaVo Corund	Velopex Aquacut	Sirona Prosmile	RONDOflex®
Areas	Handpiece 2013	Fluid Abrasion	Air Polisher and	plus 360
	(K002708)	Unit (K024105)	Prophylaxis	Handpiece
			Powder	(Modified device)
			(K033675)	
Indications	Preparation for	Preparation for pit	Intended for	SAME as KaVo
for use	fissure sealing by	and fissure	removing deposits,	Corund.
	cleaning, opening,	sealants. Removal	plaque, and	
	and extending the	and restoration of	staining on all	
	fissures; creation of	composits (sic)	visible tooth	
	micro-mechanical	Cavity	surfaces as well as	
	retention for	preparation.	in fissures and	
	adhesive	Cleaning,	interdental areas.	
	restorations on	polishing, and	The ProSmile is	
	enamel and dentine	stain removal	also	
	with subsequent		intended for the	
	acid etch technique;		following	
	preparation-of small		prophylactic	
	carious defects;		applications:	
	removal of deep		cleaning teeth	
	discolorations in the		prior to sealing	
	enamel; cleaning		cleaning teeth	
	and removal of		prior to	
	adhesive residues		fluoridation	
	from bridges,		cleaning teeth	
	crowns, etc.; and,		prior to bleaching	
	preparation of		cleaning teeth	
	adhesive surfaces of		prior to using	
	brackets.		bonding materials	
Abrasive	27 or 50 μ	29 μ or 53 μ	Sirona prophylaxe	27 and 50 μ
Material	corundum powder	corundum powder	powder and water	corundum powder
	(Aluminum oxide)	(Aluminum oxide)		and water
		and water		
Sterilization	Autoclave	SAME	SAME	DAME

6. Conclusion: In all important respects, the RONDOflex® plus 360 Handpiece is substantially equivalent to the KaVo Corund Handpiece 2013 (K002708), the Velopex Aquacut Fluid Abrasion Unit (K024105) and the Sirona Dental Systems Prosmile Air Polisher and Prophylaxis Powder (K033675). This conclusion is based on indications for use and internal validation studies.



NOV 2 3 2004

Food and Drug Administration 9200 Corporate Boulevard Rockville MD 20850

KAVO America Corporation C/O Mr. Daniel Kamm Regulatory Engineer Kamm & Associates PO Box 7007 Deerfield, Illinois 60015

Re: K042872

Trade/Device Name: RONDOflex® plus 360 Handpiece

Regulation Number: 872.6080 Regulation Name: Airbrush

Regulatory Class: II Product Code: KOJ Dated: October 14, 2004 Received: October 26, 2004

## Dear Mr. Kamm:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (240) 276-0115. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address <a href="http://www.fda.gov/cdrh/dsma/dsmamain.html">http://www.fda.gov/cdrh/dsma/dsmamain.html</a>

Sincerely yours,

Chiu Lin, Ph.D.

Director

Division of Anesthesiology, General Hospital, Infection Control and Dental Devices Office of Device Evaluation Center for Devices and Radiological Health

Enclosure

K042872

## **Indications for Use**